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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN VALENTIN,

Defendant.

CASE NO. 2:23-MJ-32-JDP

STIPULATION FOR EXTENSION OF TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUSION OF TIME

DATE: April 13, 2023
TIME: 2:00 p.m.
COURT: Hon. Carolyn K. Delaney

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney James R. Conolly, and defendant Efrain Valentin, individually and by and through his counsel of record, Chris Cosca, hereby stipulate as follows:

1. The Complaint in this case was filed on March 1, 2023. ECF No. 1. Mr. Valentin first appeared before a judicial officer of the Court in which the charges in this case were pending on March 6, 2023. The court set a preliminary hearing date of March 22, 2023, at the request of the parties, finding good cause to do so. ECF No. 6. By requests of the parties, and on a finding of good cause, the Court later extended the time for the preliminary hearing to April 13, 2023. ECF No. 14.

2. By this stipulation, the parties jointly move for an additional extension of time of the preliminary hearing date to April 20, 2023, at 2:00 p.m., before Magistrate Judge Carolyn K. Delaney, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure. Defense counsel is currently working on a trial in another matter. The parties stipulate that the delay is required to allow the defense

1 reasonable time for preparation, and for the government's continuing investigation of the case. The
2 parties further agree that the interests of justice served by granting this continuance outweigh the best
3 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

4 3. The parties agree that good cause exists for the extension of time, and that the extension
5 of time would not adversely affect the public interest in the prompt disposition of criminal cases.
6 Therefore, the parties request that the time between April 13, 2023, and April 20, 2023, be excluded
7 pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

8 IT IS SO STIPULATED.

9 Dated: April 13, 2023

PHILLIP A. TALBERT
United States Attorney

10
11 /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

12
13 Dated: April 13, 2023

/s/ CHRIS COSCA
CHRIS COSCA
Counsel for Defendant
EFRAIN VALENTIN

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN VALENTIN,

Defendant.

CASE NO. 2:23-MJ-32-JDP

FINDINGS AND ORDER EXTENDING TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUDING TIME

DATE: April 13, 2023
TIME: 2:00 p.m.
COURT: Hon. Carolyn K. Delaney

The Court has read and considered the Stipulation for Extension of Time for Preliminary Hearing/Arraignment Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on April 13, 2023. The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, demonstrates good cause for an extension of time for the preliminary hearing date for defendant Efrain Valentin, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure.

Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would not adversely affect the public interest in the prompt disposition of criminal cases.

THEREFORE, FOR GOOD CAUSE SHOWN:

1. The date of the arraignment for defendant Efrain Valentin is extended to April 20, 2023,

1 at 2:00 p.m. before Magistrate Judge Carolyn K. Delaney.

2 2. The time between April 13, 2023, and April 20, 2023, shall be excluded from calculation
3 pursuant to 18 U.S.C. § 3161(h)(7)(A).

4 IT IS SO ORDERED.

5 Dated: April 13, 2023



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE